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10                  UNITED STATES DISTRICT COURT  
11                  NORTHERN DISTRICT OF CALIFORNIA  
12                  OAKLAND DIVISION

13 UNITED STATES OF AMERICA,                  ) CR 16-0437 JST  
14                  Plaintiff,                  )  
15                  v.                  ) STIPULATION AND [PROPOSED] ORDER FOR  
16 RICARDO MANUEL DURAN,                  ) A CONTINUANCE AND EXCLUSION OF TIME  
17                  Defendant.                  ) UNDER THE SPEEDY TRIAL ACT, 18 U.S.C.  
    ) § 3161 ET. SEQ  
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19                  The United States of America, by and through its attorney of record, and defendant Ricardo  
20 Manuel Duran ("defendant"), by and through his attorney of record, hereby stipulate as follows:

21                  1.                  For the reasons stated in open court on May 5, 2017, the Court continued the above-  
22 captioned matter to May 26, 2017 at 9:30 a.m. and excluded time under the Speedy Trial Act from May  
23 5, 2017 through May 26, 2017 on the basis of effective preparation of counsel under 18 U.S.C.  
24 §§3161(h)(7)(A) and (B)(iv).

25                  2.                  The parties stipulate and agree that this matter should be continued to May 26, 2017 at  
26 9:30 a.m., and that the failure to grant such a continuance would unreasonably deny the defendant the  
27 reasonable time necessary for effective preparation, taking into account the exercise of due diligence.  
28 The parties further stipulate and agree that the time from May 5, 2017 through May 26, 2017

1 should be excluded on the basis that the ends of justice are served by taking such action which outweigh  
2 the best interest of the public and the defendant in a speedy trial and for effective preparation of counsel,  
3 taking into account the exercise of due diligence, under 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

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5 DATED: May 12, 2017

Respectfully submitted,

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BRIAN J. STRETCH  
United States Attorney

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/s/  
8 DEBORAH R. DOUGLAS  
Assistant United States Attorney

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/s/  
10 ANGELA HANSEN, Esq.  
Attorney for Defendant

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ORDER

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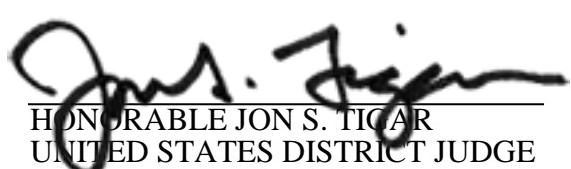
Upon the parties' stipulation, and GOOD CAUSE appearing, IT IS HEREBY ORDERED that  
the above-captioned matter shall be continued to May 26, 2017 at 9:30 a.m. for a change of plea and that  
the time from May 5, 2017 through May 26, 2017 shall be excluded in accordance with the provisions of  
the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv). The Court finds that failure to grant the  
continuance would unreasonably deny the defendant and the government the reasonable time necessary  
for effective preparation, taking into account the exercise of due diligence, and the ends of justice served  
by the continuance outweigh the best interests of the public and the defendant in a speedy trial.

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**IT IS SO ORDERED.**

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DATED: May 17, 2017

  
HONORABLE JON S. TIGAR  
UNITED STATES DISTRICT JUDGE

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